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Counsel for Defendant Chavez

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ENRIQUE CHAVEZ,

Defendant.

Case No.: CR 4:22-cr-00104-YGR

**STIPULATED [PROPOSED] ORDER
MODIFYING CONDITIONS OF
PRETRIAL RELEASE**

Enrique Chavez was released in this matter by this Court on March 31, 2021. Two conditions of his release were electronic monitoring, and a curfew. *United States v. Enrique Chavez*, CR 22-00104 YGR, Dkt. #13. With the permission of Pretrial, Mr. Chavez maintained a residence in the Eastern District of California. He has lived in Fresno near his family since his release, has obtained new employment, and there have been no allegations of any violations of pretrial release.

Mr. Chavez's next appearance is September 14, 2022 before the Honorable Judge Gonzalez Rogers. It is anticipated that he will enter a guilty plea at that appearance, pursuant to a written plea agreement that is currently being negotiated by the parties.

1 Because Mr. Chavez has done well on pretrial release, the defense moves the Court to modify
2 the conditions of pretrial release by removing the condition of electronic monitoring, and the curfew
3 condition. In particular, removing the curfew condition will allow Mr. Chavez to work late-night
4 shifts at FedEx, his current employer.

5 Mr. Chavez's supervising pretrial officer in the Eastern District has no objection to these
6 proposed modification. Mr. Chavez's assigned pretrial services officer in the Northern District of
7 California also has no objection to this modifications to the conditions of pretrial release.

8 The government has no objection to these proposed changes.

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1 Therefore, for good cause shown Mr. Chavez's conditions of pretrial release are modified to
2 remove the electronic monitoring condition, and to remove the condition of curfew. All other
3 conditions shall remain in effect.

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5 Dated: August 18, 2022

IT IS SO STIPULATED.

6 STEVEN G. KALAR
7 Kalar Law Office

8 /S
9 _____
Counsel for Enrique Chavez

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11 Dated: August 18, 2022

12 STEPHANIE HINDS
13 United States Attorney
Northern District of California

14 /S
15 _____
ANDREW PAULSON
Assistant United States Attorney

16 IT IS SO ORDERED.

17 Dated: _____

18 DONNA M. RYU
19 United States Magistrate Judge

20 _____
NORTHERN DISTRICT OF CALIFORNIA